

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to PREPA.

ORDER GRANTING TWO HUNDRED SEVENTY-FIFTH OMNIBUS OBJECTION (NON-
SUBSTANTIVE) OF PUERTO RICO ELECTRIC POWER AUTHORITY TO
SUBSEQUENTLY AMENDED CLAIMS

Upon the *Two Hundred Seventy-Fifth Omnibus Objection (Non-Substantive) of Puerto Rico Electric Power Authority to Subsequently Amended Claims* [ECF No. 15418] (the “Two Hundred Seventy-Fifth Omnibus Objection”),² filed by the Puerto Rico Electric Power Authority (“PREPA”), dated December 11, 2020, for entry of an order disallowing in their entirety

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Two Hundred Seventy-Fifth Omnibus Objection.

certain claims filed against PREPA, as more fully set forth in the Two Hundred Seventy-Fifth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Two Hundred Seventy-Fifth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Two Hundred Seventy-Fifth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Two Hundred Seventy-Fifth Omnibus Objection (collectively, the “Claims to Be Disallowed”) being duplicative of the claims identified in the column titled “Remaining Claims” in Exhibit A (collectively, the “Remaining Claims”); and the Court having determined that the relief sought in the Two Hundred Seventy-Fifth Omnibus Objection is in the best interests of PREPA, its creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Two Hundred Seventy-Fifth Omnibus Objection establish just cause for the relief granted herein; and the Court having deemed a hearing is not necessary as no objection, responsive pleading, or request for a hearing with respect to the Two Hundred Seventy-Fifth Omnibus Objection has been submitted, and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Two Hundred Seventy-Fifth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that the Debtor’s right to object to the Remaining Claims is reserved; and it is further

ORDERED that Prime Clerk, LLC, is authorized and directed to designate the Claims to Be Disallowed as expunged in the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 15418 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to Two Hundred Seventy-Fifth Omnibus Objection

TWO HUNDRED SEVENTY-FIFTH OMNIBUS OBJECTION

Exhibit A Page 6 of 8

Exhibit A – Subsequently Amended Claims

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER/ DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER/ DEBTOR	CLAIM #	CLAIM AMOUNT
1 BAKER, JOAN 4 WOODS END RD. BROOKSIDE, NJ 07926	5/23/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	19266	\$16,145.00	BAKER, JOAN 4 WOODS END ROAD BROOKSIDE, NJ 07926	5/24/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	17357	\$6,490.65
Reason: Claim has been amended and superseded by a later filed Proof of Claim									
2 GUZMAN LOPEZ, ISMAEL MOREIRA, NAYDA P.O BOX 680 GURABO, PR 00778	6/29/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	92729	\$52,126.52	ISMAEL GUZMAN LOPEZ Y NAYDA MOREIRA PO BOX 680 GURABO, PR 00078	6/29/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	115400	\$52,126.52
Reason: Claim has been amended and superseded by a later filed Proof of Claim									
3 SILVER POINT CAPITAL FUND, L.P. ALICE BYOWITZ C/O KRAMER LEVIN NAFTALIS & FRANKEL, LLP 1177 AVENUE OF AMERICAS NEW YORK, NY 10036	5/25/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	42993	\$105,745,004.00	SILVER POINT CAPITAL FUND, L.P. ALICE BYOWITZ C/O KRAMER LEVIN NAFTALIS & FRANKEL, LLP 1177 AVENUE OF AMERICAS NEW YORK, NY 10036	6/28/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	124047	\$120,550,004.00
Reason: Claim has been amended and superseded by a later filed Proof of Claim									
4 SILVER POINT CAPITAL OFFSHORE MASTER FUND, L.P. ALICE BYOWITZ C/O KRAMER BAFTALIS AND FRANKEL LLP 1177 AVENUE OF THE AMERICAS NEW YORK, NY 10036	5/25/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	23443	\$177,415,276.00	SILVER POINT CAPITAL OFFSHORE MASTER FUND, L.P. ALICE BYOWITZ C/O KRAMER LEVIN NAFTALIS & FRANKEL, LLP 1177 AVENUE OF THE AMERICAS NEW YORK, NY 10036	6/28/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	121025	\$203,050,276.00
Reason: Claim has been amended and superseded by a later filed Proof of Claim									
5 TRADEWINDS ENERGY BARCELONETA, LLC C/O JOHN ARRASTIA, ESQ. MARIAELENA GAYO-GUITIAN, ESQ., GENOVESE JOBLOVE & BATTISTA, P.A. 100 SE 2ND STREET, SUITE 4400 MIAMI, FL 33131	4/30/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	8632	\$20,400,000.00	TRADEWINDS ENERGY BARCELONETA, LLC GENOVESE JOBLOVE & BATTISTA, P.A. C/O JOHN ARRASTIA, ESQ. 100 SE 2 STREET, SUITE 4400 MIAMI, FL 33131	10/21/2020	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	177329	\$20,400,000.00
Reason: Claim has been amended and superseded by a later filed Proof of Claim									

* - Indicates claim contains unliquidated and/or undetermined amounts.

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CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER/ DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER/ DEBTOR	CLAIM #	CLAIM AMOUNT
6 TRADEWINDS ENERGY BARCELONETA, LLC GENOVESE JOBLOVE & BATTISTA, P.A. C/O JOHN ARRASTIA, ESQ., 100 SE 2ND STREET SUITE 4400 MIAMI, FL 33131	10/21/2020	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	177476	\$13,600,000.00	TRADEWINDS ENERGY VEGA BAJA, LLC GENOVESE JOBLOVE & BATTISTA, P.A. C/O JOHN ARRASTIA, ESQ. 100 SE 2 STREET, SUITE 4400 MIAMI, FL 33131	10/22/2020	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	177503	\$13,600,000.00
Reason: Claim has been amended and superseded by a later filed Proof of Claim									
7 TRADEWINDS ENERGY VEGA BAJA, LLC C/O JOHN ARRASTIA, ESQ. MARIAELENA GAYO-GUITIAN, ESQ., GENOVESE JOBLOVE & BATTISTA, P.A. 100 SE 2ND STR, SUITE 4400 MIAMI, FL 33131	4/30/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	8717	\$13,600,000.00	TRADEWINDS ENERGY BARCELONETA, LLC GENOVESE JOBLOVE & BATTISTA, P.A. C/O JOHN ARRASTIA, ESQ., 100 SE 2ND STREET SUITE 4400 MIAMI, FL 33131	10/21/2020	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	177476	\$13,600,000.00
Reason: Claim has been amended and superseded by a later filed Proof of Claim									
8 UBS FINANCIAL SERVICES INCORPORATED OF PUERTO RICO KENNETH CROWLEY 1000 HARBOR BLVD., 8TH FLOOR WEEHAWKEN, NJ 07086	5/29/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	34464	Undetermined*	UBS FINANCIAL SERVICES INCORPORATED OF PUERTO RICO KENNETH CROWLEY 1000 HARBOR BLVD., 8TH FLOOR WEEHAWKEN, NJ 07086	5/29/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	36230	Undetermined*
Reason: Claim has been amended and superseded by a later filed Proof of Claim									
9 UBS FINANCIAL SERVICES INCORPORATED OF PUERTO RICO KENNETH CROWLEY 1000 HARBOR BLVD., 8TH FLOOR WEEHAWKEN, NJ 07086	5/29/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	36202	Undetermined*	UBS FINANCIAL SERVICES INCORPORATED OF PUERTO RICO KENNETH CROWLEY 1000 HARBOR BLVD. 8TH FLOOR WEEHAWKEN, NJ 07086	5/29/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	37488	Undetermined*
Reason: Claim has been amended and superseded by a later filed Proof of Claim									

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TWO HUNDRED SEVENTY-FIFTH OMNIBUS OBJECTION

Exhibit A Page 8 of 8

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CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER/ DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER/ DEBTOR	CLAIM #	CLAIM AMOUNT
10	UBS FINANCIAL SERVICES INCORPORATED OF PUERTO RICO KENNETH CROWLEY 1000 HARBOR BLVD., 8TH FLOOR WEEHAWKEN, NJ 07086	5/29/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	37494	Undetermined*	UBS FINANCIAL SERVICES INCORPORATED OF PUERTO RICO KENNETH CROWLEY 1000 HARBOR BLVD. 8TH FLOOR WEEHAWKEN, NJ 07086	5/29/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	36214	Undetermined*
Reason: Claim has been amended and superseded by a later filed Proof of Claim										

* - Indicates claim contains unliquidated and/or undetermined amounts.